

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	
Christopher S. Graham and	:	Case No. 15-70664-JAD
Sara N. Graham,	:	
Debtors	:	Chapter 13
	:	
Ronda J. Winnecour, Chapter 13	:	Hearing: 10/28/20 10:00 a.m.
Trustee,	:	
Movant	:	Related to Docs. 179 & 180
v.	:	
	:	
Christopher S. Graham and	:	Document No.
Sara N. Graham,	:	
Respondents	:	

Response to the Trustee's Motion to Dismiss

Now come the Respondents and file this Response to the Movant's motion to dismiss.

1. The Respondent does not dispute the Trustee's calculations for this case.
2. Due to the Covid 19 epidemic, the Respondents did fall behind in payments; Christopher S. Graham was laid off of work for a month, while Sara N. Graham had her hours cut to part time.
3. If this motion is continued, the Respondents will continue to make payments In the alternative, the Respondents are willing to file a motion to extend their plan so as to add sufficient months to make the promised payments.

Wherefore, the Respondents pray for an Order continuing this matter, or in the alternative, denying the motion and Ordering the Respondents to file a motion to extend their Plan.

Respectfully submitted,

/s/Michael N. Vaporis
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